

In Re:)
)
)
 Carla D. Davies) Case No. 16-45683-659
)
 Debtors.) Chapter 13

Comes now Kimber H. Baro, Attorney for Debtor, and for her motion states:

1. Debtor filed for relief on August 15, 2016.
2. The chapter 13 plan was confirmed on November 23, 2016. The confirmed plan provides for monthly payments of \$1,150.00 for 60 months, with a \$21,002.00 guarantee to unsecured creditors.
3. When the case was filed Debtor listed a co-signed 2014 Yamaha 4 Wheeler that she intended to surrender to Capital One. Debtor's counsel inadvertently failed to put this creditor in the plan. The creditor has filed a secured proof of claim, and the plan needs to be amended to surrender the property as originally intended.
4. There has been no change in the Debtor's income or expenses.
5. Debtor has filed a First Amended Plan solely to provide for surrender of the 2014 Yamaha 4 Wheeler in paragraph 9 (B) of the Plan.

WHEREFORE, Counsel respectfully prays for an Order of this Court granting Debtor's Motion to Amend Confirmed Chapter 13 Plan, for an Order confirming Debtor's First Amended Chapter 13 Plan, and for such other and further orders as the court deems just and proper.

Kimber H. Baro 33690MO
/s/ Kimber H. Baro
Attorney for Debtor
1605 N. Lindbergh Blvd
Florissant, MO 63031
Tel: (314) 896-1999
Fax: (314) 942-7195
kbaro@barolawfirm.com

CERTIFICATE OF SERVICE

A copy of the foregoing was sent to the Trustee by ECF and mailed, postage prepaid, to the creditors listed below on December 22, 2016 to:

John V. LaBarge, Jr.
Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143

All creditors identified on attached Matrix

/s/ Kimber H. Baro

1st MidAmerica Credit Union
5301 Godfrey Rd
Godfrey, IL 62035

Cach LLC
Attn: Bankruptcy
4340 South Monaco Street
Suite 400
Denver, CO 80237

Capital One
PO Box 30285
Salt Lake City, UT 84130-0285

Capital One Retail Services
P.O. Box 30257
Salt Lake City, UT 84130-0257

Commerce Bank
P.O. Box 419248
Kansas City, MO 64141-6248

Fifth Third Bank
PO Box 63900 CC 3110
Cincinnati, OH 45263

Fresh View Solutions
4340 S. Monaco Street
Suite 400
Denver, CO 80237

Kramer & Frank P.C.
Attorney at Law
9300 Dielman Industrial Drive, #100
Saint Louis, MO 63132

Lending Club
71 Stevenson
Suite 300
San Francisco, CA 94105

Macys/DSNB
9111 Duke Blvd
Mason, OH 45040-8999

Missouri Department of Revenue
Attn: Bankruptcy Dept
P.O. Box 475
Jefferson City, MO 65105

MSD
2350 Market Street
Attn: Gwen
4th Floor Bankruptcy Department
Saint Louis, MO 63103

St. Louis County Collector of Revenue
41 South Central Avenue
Saint Louis, MO 63105

Stonegate Mortgage Corporation
P.O. Box 619063
Dallas, TX 75261-9063

United Collections Bureau, Inc.
5620 Southwyck Blvd
Suite 206
Toledo, OH 43614